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WELLS FARGO ADVISORS, LLC

18 [ADDITIONAL COUNSEL LISTED BELOW]

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20 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
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22 VLAD TSYN, individually and on behalf of
all others similarly situated,

23 Plaintiff,

24 vs.

25 WELLS FARGO ADVISORS, LLC,

26 Defendant.
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Case No. 14-cv-02552-LB

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND CASE DEADLINES**

Judge: Hon. Laurel Beeler

ADDITIONAL COUNSEL

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Attorneys for Plaintiff
VLAD TYSN

STIPULATION

WHEREAS, Plaintiffs Vlad Tsyn, Catherine Horan-Walker, Daniel Silbermann (“Plaintiffs”) bring this action against Defendant Wells Fargo Advisors, LLC (“WFA”) alleging putative class action claims under California law as well as individual claims under the federal Fair Labor Standards Act (“FLSA”);

WHEREAS, Plaintiffs initially pursued their FLSA claims on a putative collective action basis, but in light of the Court ruling on WFA’s motions for partial summary judgment, Plaintiffs, reserving their appellate rights, have confirmed that they will not be pursuing certification of the putative collective action in this case, and so Plaintiffs’ still pending FLSA claims will proceed on an individual basis only, and there is no need to schedule conditional certification proceedings;

WHEREAS, on August 11, 2016, this Court held a Further Case Management Conference during which conference the Court established certain deadlines, including the deadlines for a Motion re: Class Certification (currently set for February 9, 2017) (ECF No. 145);

WHEREAS, the Parties are still engaged in discovery pertinent to the anticipated litigation of the propriety of class certification, including taking a multi-topic deposition under Fed. R. Civ. Pro. 30(b)(6), which was delayed due the witness’ schedule and then again because, on the date of the deposition, Plaintiffs’ counsel’s flight was cancelled due to severe weather;

WHEREAS, the Parties agree, as in the past, to meet and confer following the filing of any motion to attempt to agree on a briefing and hearing schedule and, if needed, then submit any resulting dispute to the Court;

WHEREAS, the Parties have requested extensions of the case deadlines in the past;

WHEREAS, in order to preserve the time and resources of the Court and of the Parties while the Parties continue to engage in discovery, good cause exists to continue the class certification briefing and other case deadlines; and,

WHEREAS, the Parties would be happy to attend an in person or telephonic scheduling conference with the Court if the Court has any concerns about the schedule set forth in this Stipulation;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the respective Parties hereto, that, as the Court's schedule permits, the current schedule be adjusted as follows:

Case Event	Current Filing Deadline/Hearing Date	Proposed Extended Filing Deadline/Hearing Date
Filing of Motion re: Class Certification	2/9/2017	7/28/2017
Last hearing date for dispositive motions and/or further case management conference	5/4/2017, at 9:30a.m.	10/26/2017, at 9:30a.m.
Meet and confer re pretrial filings	7/28/2017	12/7/2017
Pretrial filings due	8/10/2017	12/21/2017
Oppositions, Objections, Exhibits, and Depo Designations due	8/24/2017	1/18/2018
Final Pretrial Conference	9/28/2017, at 1:30 p.m.	2/3/2018, at 1:30 p.m.
Trial	10/10/2017, at 8:30 a.m.	2/12/2018, at 8:30 a.m.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: February 21, 2017

WYNNE LAW FIRM
EDWARD J. WYNNE

By: /s/ Edward J. Wynne
EDWARD J. WYNNE
Attorneys for Plaintiff
VLAD TYSN

1 DATED: February 21, 2017

MUNGER, TOLLES & OLSON LLP

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4 By: /s/ Malcolm A. Heinicke

MALCOLM A. HEINICKE

5 Attorneys for Defendant

6 WELLS FARGO ADVISORS, LLC

7 FILER'S ATTESTATION

8 Pursuant to Local Rule 5-1(i)(3), regarding signatures, I attest that concurrence in the filing
9 of the document has been obtained from each of the other signatories listed above.
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[~~PROPOSED~~] ORDER

Pursuant to the Parties' Joint Stipulation, it is hereby ORDERED that the case deadlines in this matter be continued as follows:

Case Event	Current Filing Deadline/Hearing Date	Proposed Extended Filing Deadline/Hearing Date
Filing of Motion re: Class Certification	2/9/2017	7/28/2017
Last hearing date for dispositive motions and/or further case management conference	5/4/2017, at 9:30a.m.	10/26/2017, at 9:30a.m.
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Oppositions, Objections, Exhibits, and Depo Designations due	8/24/2017	1/18/2018
Final Pretrial Conference	9/28/2017, at 1:30 p.m.	2/3/2018 , at 1:30 p.m. 02/01/2018
Trial	10/10/2017, at 8:30 a.m.	2/12/2018, at 8:30 a.m.

It is so ordered as modified.

Date: 02/22/2017



HONORABLE LAUREL BEELER